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January 27, 1999

VIA HAND DELIVERY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Ex Parte Submission in CC Docket No. 97-231; CC Docket No. 97-121; CC Docket No. 97-208; CC Docket No. 97-137; CC Docket No. 98-121

Dear Ms. Salas:

Enclosed is a copy of a chart entitled "Key Elements of Independent, Third-Party OSS Testing: A Comparison of the New York and Texas OSS Tests" which was faxed without cover letter to Lawrence E. Strickling on January 26, 1999 and to Jake E. Jennings on January 27, 1999.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

Keith L. Seat

Enclosure

cc: Lawrence E. Strickling
Jake E. Jennings

January 26, 1999

Key Elements of Independent, Third-Party OSS Testing: A Comparison of the New York and Texas OSS Tests

Key Elements of Third Party OSS Test (Implemented in New York, Except as Noted)	Current Status of Third Party Monitoring of OSS Test in Texas
Role of Third Party. Reliance on an independent, technically-skilled third party to develop the test, conduct it, monitor the results, and report on the test will expedite the identification and resolution of problems with the BOC's operations support systems (OSS), as well as clarify complex facts for accurate decision-making by state and federal regulatory agencies. (New York chose KPMG and Hewlett Packard to develop, implement, monitor and report on test.) Third party should develop the test plan, working with the interested parties.	The Texas PUC chose Bellcore to monitor OSS testing by CLECs, raising issues of partiality when Bellcore is to oversee testing of various SWBT systems that Bellcore itself developed. SWBT remains a major Bellcore customer, giving Bellcore a great deal of incentive not to alienate SWBT. These concerns were only heightened by SWBT's initial proposal to include this testing project in SWBT's ongoing master service contract with Bellcore. Texas has asked Bellcore to develop a test plan, on which the parties will be able to provide comments.
Build Interfaces to Test Documentation. Third party should build all necessary OSS interfaces to determine whether the BOC's documentation is sufficient to permit CLECs to develop their OSS in order to enter the market across the range of order types. The test systems can be built more quickly and cheaply than CLEC systems because they are not integrated into real back-end business operations and need not be as large and robust as actual commercial systems. (HP has built the interfaces in New York.) Third party should test and review all supporting documentation for OSS and processes, including business rules, EDI specifications, CLEC handbooks, and other materials.	Texas is seeking to test only the limited OSS interfaces built by AT&T and MCI WorldCom for limited types of service (UNE-platform and loops, respectively). It is unresolved whether other order types would be tested. AT&T and MCIW were only able to complete their interfaces through a great deal of intervention from the Texas PUC, which is unlikely to be available for future development efforts. A BOC's final specifications and business rules must be tested by an independent third party to make sure any CLEC could build an interface based only on the specifications. A BOC will have no incentive to rapidly cure documentation problems after 271 entry. Use of CLEC interfaces will also result in BOC claims of bias or malice when problems in the BOC systems are found, which can be largely avoided by use of independent, third party interfaces.

Change Management. Third party should evaluate change management processes by reviewing actual notices, such as modifications to business rules, to ensure the BOC is complying with established procedures.	Texas has an opportunity to review change management processes with SWBT's December 19 EDI release, but it is unclear what will be done. However, there will be no testing of change management beyond the December 19 release.
Performance Measurement Validation. Prior to testing, a performance measurement system must be validated, and the test results must be measured against pre-established performance standards.	Not yet done.
Open Process. CLECs should be given access to all materials and assistance provided by the BOC to the third party, to ensure that the development of the third party can be duplicated by competitors in the real world. Minutes should be kept of all contacts between the third party and the BOC and made available to the CLECs. CLEC monitoring of test ensures that current versions of systems/documentation are being tested and ensures that the third party is not receiving assistance and cooperation the CLECs will not be able to enjoy following 271 entry.	CLECs have been involved in the process, although sometimes limited in key technical meetings to only one representative, preventing CLECs from bringing subject matter experts when multiple subjects are discussed. SWBT, by contrast, has been permitted to bring several representatives to each meeting.
Test All Functionalities. OSS test must be end-to-end, and thoroughly test pre-ordering, ordering, provisioning, maintenance and repair, and billing, including integration of pre-ordering and ordering. The Commission's orders have required proof of access to these functions, all of which are imperative for full scale commercial operation by competitors. (New York planned a four week feature functionality test and a three day volume test of each function.)	See below.
Pre-order should include the testing of functions such as address validation, CSR availability, USOC availability, numbering resource availability, due date interval and availability, editing capabilities, systems integration capabilities, telephone number verification, current PIC status verification, and facilities availability.	In Texas, EDI for pre-ordering will not be tested, even though the only pre-ordering alternative is SWBT's own proprietary (non industry standard) system. Other pre-order testing issues are unresolved, particularly how to obtain telephone numbers for test.

Order functionalities tested should include access to product and service offerings for both simple and complex orders and promotions, performance of the provisioning and order status reports, editing capabilities and the integration of ordering systems with other systems.	Unresolved.
Provisioning is important to make sure that a sizeable quantity of orders are run through the system from start to finish and actually provisioned. (In New York, 20% of test orders are to be provisioned, totaling about 3000 orders).	Texas plans to provision 1000 orders, but the details are unresolved.
Maintenance and Repair should include the implementation of the electronic bonding interface, and test functionalities including OSS interface availability, average OSS response interval, average answer time - repair, missed repair appointments, customer trouble report rate, maintenance average duration, percent repeat troubles (within 30 days) and out of service greater than 24 hours.	Details unresolved, although testing of Maintenance and Repair included in scope of test.
Billing testing should include invoice accuracy, invoice timeliness, usage data delivery accuracy, usage data delivery timeliness and completeness, and ability to capture usage data for all calls including local and access. The test should also include an audit of the BOC's end-user billing, wholesale billing, reciprocal compensation billing, and access billing. The test should cover two or three complete billing cycles, which can be compressed in time within the BOC's systems (although only one billing cycle is planned in New York).	Unresolved.
Stress Test. A volume stress test appropriate to the market should be required over multiple days. (New York plans 5000 transactions per day on each of three days.)	Unresolved.

Test Scenarios. Detailed test scenarios must be developed by the third party for the test, including specific order and customer information. (New York is testing 133 scenarios, which represent over 80% of CLEC order types.)	Test scenarios identified but no overall test plan developed yet.
Full Range of Orders. The test should cover the full range of orders that would permit all modes of market entry including, but not limited to, UNE combinations. This is needed to ensure that OSS for all modes of entry contemplated by the Telecommunications Act is available to CLECs regardless of whether other barriers currently prevent CLECs from entering the local market.	Unresolved.
Realistic Mix of Orders. The test should involve the types of orders that are likely in a competitive environment, and CLECs should be able to provide input to the third party.	Unresolved.
Submission of Orders. Third party should develop, submit, and track the Local Service Requests (LSRs) based on BOC provided documentation.	No final determination has been made on how LSRs will be handled. Initially, SWBT unsuccessfully suggested that it should complete the LSRs itself.
Test Bed. Obtain large quantity of numbers to use for purposes of testing, which must be reviewed to ensure that the BOC is not providing "clean" data or else problems will not be identified which will hinder local competition. (Bell Atlantic has provided a test bed of about 7000 numbers for the New York test.)	SWBT is refusing to provide an adequate test bed of numbers.
"Blind" Testing. For volume testing, orders should be submitted to the BOC without it knowing when they will arrive, to avoid the BOC being prepared only on the specific days of the test.	Unresolved.
Collocation. The process for ordering and obtaining CLEC collocation within BOC end offices must be tested.	Not in current scope of the Texas test.

xDSL OSS Capabilities. Due to the rapidly developing market for broadband and data services, BOC support for all types of xDSL is vital to the future of competition and should be tested as fully as possible. In particular, access to loop qualification and BOC bandwidth management information must be tested, along with other xDSL specific systems. (New York testing related issues with ISDN.)	Unresolved.
"Regression" Testing after Problems Found. Third party should back up and retest any fixes that are made by the BOC to ensure both that the problem has been fixed and that no other problem has been created. (New York plans to conduct regression testing as appropriate, without clearly defining the bounds.)	Burden is on the CLECs to conduct any regression testing they consider necessary. Bellcore is not scheduled to conduct any regression testing.
Proof, Not Promises. The goal of testing is to find and fix problems that would prevent local competition, rather than relying on promises of adequate performance. The BOC must demonstrate that the problems have been resolved before the test is completed.	Unresolved.